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11 **Attorneys for Defendant, BERK ERATAY**

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

* * * * *

10 **UNITED STATES OF AMERICA,**)
11)
12 **Plaintiff,**) **CASE NO. 2:22-mj-00433-VCF**
13 **v.**)
14 **BERK ERATAY,**)
15 **Defendant,**)
16 _____)

17 **STIPULATION TO CONTINUE DEFENDANT'S IDENTITY AND REMOVAL**
18 **HEARING SCHEDULED FOR JUNE 3, 2022**

19 **IT IS HEREBY STIPULATED AND AGREED,** by and between Jason Frierson, United
20 States Attorney, and Jacob Operskalski, Assistant United States Attorney, counsel for the United
21 States of America; and David Chesnoff, Esq., and Richard Schonfeld, Esq. counsel for Defendant
22 Berk Eratay, that the Court continue the Removal hearing currently scheduled for June 3, 2022, at
23 11:00 a.m. and propose that the hearing take place on July 8, 2022, at 11:00am.

24
25 This Stipulation is entered for the following reasons:

- 26 1. The Government requested a Protective Order prior to producing discovery relative
27 to the Identity and Removal hearing. The Protective Order was entered by the Court
28

1 on June 1, 2022, and discovery will be forthcoming;

2 2. Counsel for the Defendant will need time to review the discovery and communicate
3 with their client after the review;

4 3. The Defendant is in custody;

5 4. Additionally, denial of this request for continuance would result in a miscarriage of
6 justice;
7

8 For the foregoing reasons, the parties request a continuance of the Identity and Removal
9 hearing.
10

11 Dated this 2nd day of June, 2022.

12 /s/ Jacob H. Operskalski

13 **JACOB H. OPERSKALSKI**
14 Assistant United States Attorney
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16 Suite 1100
17 Las Vegas, Nevada 89101
18 jacob.operskalski@usdoj.gov

/s/ Richard A. Schonfeld

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10 * * * * *

10 **UNITED STATES OF AMERICA,**)
11)
12 **Plaintiff,**) **CASE NO. 2:22-mj-00433-VCF**
13 **v.**)
14 **BERK ERATAY,**) **ORDER ON STIPULATION TO**
15 **Defendant,**) **CONTINUE IDENTITY AND**
16 **REMOVAL HEARING**

17 Based on the stipulation of counsel, good cause appearing, and the best interest of justice
18 being served:

19 **IT IS ORDERED** that the Identity and Removal hearing currently scheduled for June 3,
20 an in-person hearing
21 2022, at the hour of 11:00 a.m., be vacated and continued to July 8, 2022 at the hour of 11:00 AM
22 in Courtroom 3D.

23 **DATED** this 2nd day of June, 2022.

24 IT IS FURTHER ORDERED that the parties
25 must coordinate with Tawnee Renfro at
26 Tawnee_Renfro@nvd.uscourts.gov for any
27 virtual appearances by noon, July 7, 2022.

28 
HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE